

STATE OF ALASKA

DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE Prevention and Emergency Response Program

SEAN PARNELL, GOVERNOR

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January 6, 2012

Alaska Logistics
Attn: Mr. Mrs. Allyn Long
P.O. Box 3512
Seattle, WA 98124

Certified Mail Return
Return Receipt Requested
7010-2780-0000-2089-9911

RE: F/B *Logistics Provider* 5.5 Ton PCB Release, Case #11269930801

Dear Mr. Mrs. Long:

This letter is to advise you that on November 4, 2011 a pollution incident occurred in Nushagak River approximately 60 feet from Dillingham City Dock. It is understood that a 20 foot wood deck flat gave way during a barge to barge transfer releasing a 5.5 ton doubled lined sealed bag of 15ppm-50ppm PCB's into Nushagak River. Following our November 22, 2011 meeting it was determined safer to remove the super sack when ice accumulation was no longer a safety issue and a barge could be used as a platform directly above the super sack in the spring of 2012.

Alaska Statute, Title 46, authorizes the state government to respond to this pollution incident and to take appropriate action to minimize damages to human health, safety, or welfare of the environment. Under this Act, if the owner or operator of the source fails to take adequate removal actions, the owner or operator may be held financially responsible for any actions taken by the State. Removal is adequate and being done properly if it is done in accordance with Federal and State statutes and State regulations 18 AAC 75. Two weeks prior to conducting removal of the super sack ADEC must be notified so we may be available to monitor the event. Please provide ADEC with the following:

1. Detailed removal plan – The removal plan should include how you plan to remove the super sack including containment used to contain liquid draining from the sack, break strength of super sack exposed to sea water, and harness strength used to retrieve super sack.
2. A response plan – The cleanup/response plan under 18 AAC 75.325 should address cleanup of PCB's from the river bottom if the super sack fails.
3. Sampling plan – The sampling plan outlined in and 18 AAC 75.355 will be required to identify any PCB contamination on the river bottom. Water draining from the super sack must also be sampled for presence of PCB contamination.
4. Final report - Under 18 AAC 75.300(e) a final report enclosed must be completed. The State is especially interested in what actions you will take to prevent reoccurrence and why a

F/B Logistics Provider 5.5 Ton PCB Release

wooden platform was used instead of a steel one. 18AAC75.307 requires final report be submitted within 15 days after cleanup is complete.

Alaska Statute 46.08.070 requires recovery be sought for costs incurred by the State in response to this incident, which includes any oversight activities. Please be advised that we may be billing you at a later date for state expenditures associated with this spill. Billable state expenditures include all direct time and materials costs and indirect overhead costs. Billable staff time will comprise all time spent on activities related to the incident, including time spent for site visits, response and report reviews, telephone conversations, and meetings.

Should you require further information concerning this matter please contact me at 907-269-7532.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark J. Sielaff", enclosed within a large, loopy circular flourish.

Mark J. Sielaff
Project Manager

Enclosure: Final Report

cc: Steve Russel, SOSC